

Cooper & Kirk

Lawyers

A Professional Limited Liability Company

Nicole Jo Moss
(202) 220-9660
nmoss@cooperkirk.com

1523 New Hampshire Avenue, N.W.
Washington, D.C. 20036

(202) 220-9600
Fax (202) 220-9601

September 8, 2021

VIA ECF

The Honorable Loretta A. Preska
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: ***Giuffre v. Dershowitz*, Case No. 19-cv-3377-LAP**
Permission To File Under Seal

Dear Judge Preska:

I write on behalf of Plaintiff Virginia Giuffre. Pursuant to Rule 1.A of Your Honor's Individual Practices, Plaintiff respectfully requests permission to file under seal, with a redacted version filed on the public docket, her response to Defendant's pre-motion letter filed under seal today, September 8, 2021 (Doc. 334). In support of this request, we note that the Court granted Defendant leave to file his pre-motion letter under seal, *see* Doc. 332, and Plaintiff will both be responding to that sealed filing, as well as referencing documents that have been designated as confidential under applicable protective orders.

In addition, we request permission to disclose and discuss Defendant's sealed pre-motion letter, together with its exhibits, with Plaintiff's counsel at the law firm of Boies Schiller as those attorneys represent Plaintiff in the *Giuffre v. Prince Andrew, Duke of York* matter referenced in Defendant's pre-motion letter. In support of this request, Plaintiff notes that counsel at Boies Schiller already have access to the confidential material attached to or discussed in Defendant's pre-motion letter by virtue of their participation in *Giuffre v. Maxwell*, Case No. 15-cv-7433-LAP (S.D.N.Y.).

Respectfully,

s/Nicole Jo Moss

Nicole J. Moss

cc: Counsel of Record